

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

SNUGGLYCAT INC.,)	
)	
Plaintiff)	
)	
v.)	Case No. 6:18-cv-03110-SRB
)	
OPFER COMMUNICATIONS,)	
et al,)	
)	
Defendants.)	

JOINT PROPOSED SCHEDULING ORDER/DISCOVERY PLAN

Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 26.1(a), the parties conducted their Rule 26(f) conference on June 1, 2018, and submit the following proposed scheduling order and discovery plan.

Proposed Scheduling Order

1. Date for amending pleadings and/or adding parties: July 26, 2018;
2. Plaintiff's expert disclosures: August 1, 2018;
3. Defendants' expert disclosures: September 15, 2018;
4. Plaintiff's rebuttal expert disclosures: November 1, 2018;
5. Discovery completion date: December 15, 2018;
6. Dispositive motion deadline: January 15, 2019;
7. *Daubert* motion deadline: January 15, 2019
8. Trial date: June 2019.

Plaintiff has demanded a jury trial, and the parties anticipate the trial to last five trial days.

Discovery Plan

The parties will make their Rule 26(a)(1) disclosures on or before June 15, 2018.

The parties believe that the standard 180 days for discovery is appropriate.

The parties agree to make their initial production of documents in PDF (or similar) format. If, upon receipt of discovery materials, the receiving party believes that production in native format and/or with metadata is necessary, the parties agreed to confer regarding the need for a supplemental document production.

The parties agree that the clawback provisions of Federal Rule of Civil Procedure 26(b)(5)(B) apply, and ask the Court to include in the Scheduling Order the language from the Western District of Missouri Model Rule 502(d) Order.

The parties do not propose any changes to the limitations on discovery under the Federal Rules of Civil Procedure.

Respectfully submitted,

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